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Arizona Corporation Commission

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BEFORE THE ARIZONA CORPORATION COMMISSION

2000 APR 24 12 12

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2 CARL J. KUNASEK
Chairman
3 JIM IRVIN
Commissioner
4 WILLIAM A. MUNDELL
Commissioner

AZ CORP COMMISSION
DOCUMENT CONTROL

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5
6 IN THE MATTER OF THE GENERIC
7 INVESTIGATION INTO U S WEST
8 COMMUNICATIONS, INC.'S
9 COMPLIANCE WITH CERTAIN
10 WHOLESALE PRICING REQUIREMENTS
11 FOR UNBUNDLED NETWORK ELEMENTS
12 AND RESALE DISCOUNTS.

DOCKET NO. T-00000A-00-0194

U S WEST COMMUNICATIONS,
INC.'S COMMENTS REGARDING THE
SCOPE OF THIS PROCEEDING

13 Pursuant to the Commission's Procedural Order dated March
14 30, 2000, U S WEST Communications, Inc. submits the following
15 comments regarding the scope of this proceeding. U S WEST
16 proposes the following:

17 1. There should be only two phases to this proceeding.
18 In the first phase, the Commission should address deaveraging of
19 the existing wholesale rates. In the second phase, the
20 Commission should address the rates for linesharing and for new
21 network elements identified in the FCC's Third Report and Order.
22 The Commission could also address matters raised by FCC orders
23 issued since the initial cost docket. Since cost studies will
24 have to be prepared, it will be necessary to identify the issues
25 to be covered in the second phase. Accordingly, U S WEST
26 proposes that there be a procedural conference after the Phase I
hearing to identify the issues to be covered in Phase II.

2. The issues raised by the remand from the United
States District Court in U S WEST v. Jennings, 46 F. Supp.2d 1004

1 (D. Ariz. May 5, 1999), should be addressed in the Commission
2 docket that was created for that matter. Since a different group
3 of parties appeared in that proceeding, inclusion of the remand
4 issues in this proceeding would lead to unnecessary confusion and
5 inefficiency.

6 3. Issues relating to the SGAT other than those related
7 to the 271 Docket should be addressed in the SGAT docket that has
8 already been created. Inclusion of matters relating to the SGAT
9 in the instant docket would also lead to confusion and
10 inefficiency.

11 The division of issues among dockets described above will
12 allow for the handling of all issues that need to be addressed
13 while also maximizing administrative efficiency.

14 RESPECTFULLY SUBMITTED this 24th day of April, 2000.

15 U S WEST Communications, Inc

16
17 By: 

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1 ORIGINAL and 10 copies of the
2 foregoing hand-delivered for
3 filing this 27th day of April, 2000
4 to:

5 Docket Control
6 ARIZONA CORPORATION COMMISSION
7 1200 West Washington
8 Phoenix, Arizona 85007

9 COPY of the foregoing hand-delivered
10 this 27th day of April, 2000, to:

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17 Deborah R. Scott
18 Director, Utilities Division
19 ARIZONA CORPORATION COMMISSION
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22 THREE COPIES of the foregoing
23 hand-delivered this day of
24 April, 2000 to :

25 Jerry Rudibaugh, Chief Arbitrator
26 Hearing Division
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27 COPY of the foregoing mailed
28 this 27th day of April, 2000, to:

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